

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

PRESIDENT DONALD J. TRUMP, an individual,

Plaintiff,

v.

AMERICAN BROADCASTING COMPANIES, INC.,
a Delaware corporation, ABC NEWS, INC., a Delaware
corporation, and GEORGE STEPHANOPOULOS, an
individual,

Defendants.

Case No.: 1:24-cv-21050-CMA

**JOINT MOTION TO EXTEND CERTAIN DEADLINES
ASSOCIATED WITH DEFENDANTS' MOTION TO DISMISS
AND INCORPORATED MEMODANDUM OF LAW [DE 24]**

Plaintiff President Donald J. Trump ("Plaintiff") and Defendants American Broadcasting Companies, Inc., ABC News, Inc. and George Stephanopoulos ("Defendants") (collectively referred to as the "Parties"), by and through their respective undersigned counsel and pursuant to Fed. R. Civ. P. 6 and S.D. Fla. L.R. 7.1, hereby move to extend certain deadlines associated with Defendants' Motion to Dismiss and Incorporated Memorandum of Law [DE 24] (the "Motion"), and in support state as follows:

1. On or about May 10, 2024, Defendants filed their Motion to Dismiss Complaint and Incorporated of Law (the "Motion to Dismiss") [DE 24].
2. The current deadline for Plaintiff to file his Response in Opposition to the Motion to Dismiss Complaint (the "Response") is May 24, 2024.
3. Pursuant to Local Rule 7.1(c)(1), Defendants' Reply in Support of their Motion to Dismiss (the "Reply") would be due within seven (7) days after Plaintiff's filing of his Response, making the deadline May 31, 2024.

4. Plaintiff seeks to extend the deadline to file the Response by fourteen (14) days and Defendants seek to extend the deadline to file the Reply by seven (7) days as follows:

	Current Deadline	Proposed Deadline
Plaintiff's Response to Motion to Dismiss	<i>May 24, 2024</i>	<i>June 7, 2024</i>
Defendants' Reply to Motion to Dismiss	<i>May 31, 2024</i>	<i>July 21, 2024</i>

5. This Motion is brought in good faith and is not being made for purposes of delay or any other improper or dilatory purpose. Moreover, this enlargement of time does not prejudice any party.

6. A proposed Order accompanies this Motion.

WHEREFORE, Plaintiff President Donald J. Trump and Defendants American Broadcasting Companies, Inc., ABC News, Inc. and George Stephanopoulos, respectfully request that this Court enter an Order (a) granting an enlargement of time, up to and including June 7, 2024 for Plaintiff to file his Response in Opposition to the Motion to Dismiss, (b) granting an enlargement of time, up to and including June 21, 2024 for Defendants to file their Reply in Support of the Motion to Dismiss, and (c) granting such other and further relief as this Court deems just and proper.

Date: May 22, 2024

[Signature Block to follow]

Respectfully submitted,

/s/ Alejandro Brito

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